

We are also cooperating with, and have in certain instances self-reported to, government authorities in Indonesia, including the Indonesian National Police, the Public Prosecution Service, and the Corruption Eradication Commission, various matters involving alleged or potential violations of Indonesian laws and regulations by our business units, subsidiaries, and affiliates, including anti-corruption, alleged fraud, embezzlement, and issues associated with trade receivables, some of which are related to the matters under investigation by the SEC and DOJ. On May 2025, the DKI Jakarta High Prosecutor's Office determined eleven individuals to be suspects and detained them in connection with alleged corruption involving fictitious financing at our company, relating to conduct primarily between 2016 and 2019, following our submission of internal audit findings in support of the Government's *Bersih-Bersih* BUMN program. We have taken corrective actions including disciplinary action against involved employees, asset recovery efforts, and policy changes. We fully support the applicable legal processes in Indonesia and continue to cooperate with Indonesian authorities. The outcomes of these proceedings remain uncertain and could expose us to additional liability, reputational harm, or operational disruption.

Recapitulation of Legal Cases in 2023 - 2025

Status	Legal Cases					
	2025		2024		2023	
	Criminal	Civil*	Criminal	Civil*	Criminal	Civil*
In progress	87	66	62	91	42	55
Completed	43	59	36	35	13	43
Sub Total	130	125	98	126	55	98
Total	255		224		153	

Remarks:

* Combination of Civil and Non-Litigation cases.

Corporate Code of Conduct

Code of Conduct's Implementation for Board of Directors, Board of Commissioners, and Employees

TelkomGroup believes that sustainability is not only about business growth, but also how that growth occurs with the principles of business ethics that are shared by all Directors, Board of Commissioners, and employees.

Based on Sarbanes-Oxley Act (SOA) 2002 Section 406, Telkom has a code of ethics which is regulated in several regulations as follows:

1. KD.36/HK290/COP-D0053000/2009 regarding Integrity Pact.
2. PD.201.01/r.00/PS150/COP-B0400000/2014 regarding Business Ethics in TelkomGroup Environment.
3. PD.602.00/r.00/HK000/COP-D0030000/2011 regarding Telkom's GCG Management Guidelines.
4. PR.209.10/r.02/HK200/COP-A0700000/2023 regarding Respectful Workplace.
5. PR.209.05/r.02/HK250/COP-A0900000/2024 regarding Employee Discipline.
6. PR.209.03/r.02/HK270/COP-A0900000/2024 regarding Obligation to Submit LHKPN within TelkomGroup Environment.
7. PR.209.04/r.02/HK270/COP-A0900000/2024 regarding Gratification Control.

One of the implementations of code of ethics is obligation for employees to undergo business ethics certification, which includes a Business Ethics Statement Letter and an Integrity Pact, completed and signed by all TelkomGroup employees annually. This certification is also carried out by the Board of Directors as company leaders to demonstrate the leadership's commitment to business practices and ethical behavior within the company.

Management ensures the effective implementation of Good Corporate Governance by implementing business ethics policies to achieve superior, sustainable business performance, and to comply with ethical principles consistent with applicable laws and regulations. This also applies to vendors collaborating with Telkom, who also complete an Integrity Pact.

Code of Conduct's Principles

Telkom's Code of Conduct, among others, regulates the following key matters:

1. Employee Ethics

Contains a system of values or norms used by all employees and leaders in their daily work, both the main behavior of employees and the main behavior of leaders.

2. Business Ethics

Contains a system of values or norms adopted by the company as a reference for the company, management, and employees to relate to external parties, including regulators, stakeholders, and other external parties.

Socialization of the Code of Ethics and its Efforts to Enforcement

Every year, Telkom management carries outreach to all employees in the TelkomGroup regarding understanding GCG, Business Ethics, Integrity Pact, Fraud, Risk Management, Internal Control (SOA), Whistleblowing, Prohibition of Gratification, IT Governance, Information Security, Anti-Bribery Management System and other matters. Others related to ethics and corporate governance practices.

Telkom's code of ethics socialization aims to not only raise awareness but also continuously improve understanding of the applicable code of ethics. Periodic awareness enhancements, both in terms of policy and implementation, are carried out through various channels owned by TelkomGroup, including internal company media such as Web Portal, Instagram, Diarium, WhatsApp Blast, E-mail Blast, and other media.

Senior Leader also regularly provides reminders regarding business practices and ethical behavior at events, such as RAPIM (Ministry of Work Meetings), Townhall, Briefing Unit, Coffee Morning, Culture Event, and other formal and informal events. New employees are also provided with an understanding of business practices and ethical behavior through Great People Trainee Program (GPTP) briefing material. Sharing session are also held with experts (KPK, Ministry of State-Owned Enterprises, Ministry of Manpower, and practitioners), as well as benchmarking activities conducted at other companies.

Socialization of the Code of Conduct in 2025

No.	Approach	Amount Reached/Participation
1.	E-learning	4782/4782
2.	Face to face (training, communication forum/workshop)	145/4782
3.	Socialization material through the internet portal	4782/4782

In practice, any violation of the code of ethics will potentially result in sanctions, following a mechanism in accordance with applicable company policies. The following are the categories of sanctions applicable to Telkom employees.

No.	Main Point	Type of Violation	Sanction
1.	Employee Work Ethics	1. Misdemeanor	Minor Disciplinary Sanction
		2. Moderate Violation	Moderate Disciplinary Sanction
		3. Serious Violation	Severe Disciplinary Sanction
2.	Business Ethics	1. Insider Trading	Integrity Committee Decision
		2. Conflict of Interest	Employee Discipline Committee Decision
		3. Window Dressing	Integrity Committee Decision
		4. Gratification	Employee Discipline Committee Decision

Code of Conduct Implementation Report

In 2025, Telkom processed 19 cases of violations of the code of conduct and employee discipline involving 93 perpetrators. Of these, 17 cases have been resolved while 3 other cases are still in process. Employees who have received decisions are 86 perpetrators while 7 other perpetrators are still in process. This number shows a significant increase in case resolution compared to the previous year, where out of 12 cases with 131 perpetrators, there were still 5 cases involving 27 employees that were still in process. Therefore, Telkom continues to make various efforts to improve the quality of internal control to reduce the number of code of conduct violations in the future.

Enforcement of Code of Conduct in 2025

No.	Form of Code Violation	Number of Code Violation	Sanction Given
1.	Misuse of Goods/Assets/Money/ Authority-Position	11 cases	Disciplinary Sanction Minor : 0 Medium : 7 Severe : 41 Cleared/Warning : 30 Issued In Progress : 7
2.	Absenteeism	5 cases	Resigned : 1 Voluntarily Cleared/Warning : 0 Issued Severe : 4
3.	Criminal Case	1 case	Severe : 1
4.	Violations of Moral Norms	2 cases	Severe : 2
5.	Others	0 case	Disciplinary Sanction Minor : 0 Medium : 0 Severe : 0 Cleared/Warning : 0 Issued In Progress : 0